

MEMO ENDORSED



S P I R E L A W

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Via Electronic Filing

The Honorable Judge Jessica G.L. Clarke
United States Courthouse
500 Pearl St. Courtroom 20C
New York, NY 10007-1312

August 1, 2024

Re.: *Vuppala v. Land of Buddha, Inc. et al*
Case No: 1:22-cv-09044

Post-Discovery Status Report

Dear Judge Clarke:

Per the Court's Second Civil Case Management Plan and Scheduling Order (Doc. 51), Defendant Land of Buddha provides a post-discovery status report. On July 18, 2024, the fact discovery period in the above-referenced case ended. To date, the Parties have exchanged written discovery requests and responses, including Requests for Admissions, and have issued Notices of Depositions to Plaintiff and corporate representatives of Defendant Land of Buddha. No other Defendant has appeared.

Some discovery remains to be completed. Plaintiff has issued Notices of Deposition to (1) the Corporate Representative of Land of Buddha and (2) Former Day-to-Day Manager of Land of Buddha Subject Facility. Plaintiff has, at least in part, taken the deposition of Land of Buddha's Former Day-to-Day Manager. Plaintiff has expressed an intent to complete the deposition of Land of Buddha's Former Day-to-Day Manager and to take the Deposition of Land of Buddha's Corporate Representative. Land of Buddha, a company comprised of a single individual, opposes any further deposition of its sole employee. Defendant has noticed Plaintiff's deposition but has yet to take Plaintiff's deposition.

Defendant filed a Motion to Dismiss, which has been fully briefed and is pending before this Court. (*See* Doc. 57.)

We thank the Court for its attention and consideration of this matter.

Respectfully,



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Ian E. Smith, Esq.
Partner, Spire Law, LLC

cc: Counsel of Record (Via ECF)
Ron Soloman (via email)

The parties are directed to file a joint letter that complies with Individual Rule 3(d) no later than **August 9, 2024**. Fact discovery closed on July 18, 2024. ECF No. 51. No timely applications for extensions were made. Any application for limited extension of fact discovery must be included in the letter due August 9 and be made in compliance with Individual Rule 2(e).

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

Dated: August 5, 2024
New York, New York